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Ms. Sui Lang Panoke  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, DC 20463

Re: Human Rights Campaign PAC (December 2007 Monthly Report)  
Identification Number: C00235853

Dear Ms. Panoke:

This letter responds to your request for additional information dated February 15, 2008 regarding HRC PAC's December 2007 Monthly Report.

You asked for a description of HRC PAC's procedures for requesting the identification of information for individuals who contribute in excess of \$200 in a calendar year. HRC PAC has established procedures consistent with the FEC's best efforts regulations. HRC PAC solicitations include a clear and conspicuous request for contributor information. If that information is not provided in response to the original solicitation, HRC PAC has a standard form letter to send to individuals specifically requesting this information. Finally, our procedures provide that contributor information that is received after the contribution is reported will be appropriately disclosed in an amended or future report.

In response to your similar letter of January 11, 2008, HRC PAC initiated a further review of its procedures in order to regularly obtain updated contributor information from recurring contributors, i.e. contributors who make monthly or quarterly contributions to HRC PAC. HRC PAC is in the process of requesting additional or updated information from these contributors and will amend reports or update future reports as appropriate.

We appreciate the guidance regarding the reporting of self-employed individuals and are mailing best efforts letters to the individuals you identified, notifying them that the employer and/or occupation information they provided is inadequate. We have previously relied upon the Special Employer Information guidance on page 54 of the January 2007 Campaign Guide for Corporations and Labor Organizations. However, we have initiated further steps to adhere to your letters and the specific advice you provided by telephone on February 1, 2008.

I hope this additional information answers your specific requests. Should you need further information, please feel free to contact me at (202) 216-1549.

Sincerely,

Jim Rinefierd  
Treasurer  
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